



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd Floor
New York, New York 10007

BY ECF

September 9, 2020

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write with the consent of Plaintiffs' counsel respectfully to request a short *nunc pro tunc* extension of Defendants' deadline to file their papers in opposition to Plaintiffs' motion for a preliminary injunction (ECF No. 19). Defendants have filed all of their opposition papers (ECF Nos. 22-33). However, while Defendants began their filing before midnight, due to late-stage difficulties in obtaining signed copies of some of Defendants' supporting declarations, as well as subsequent ECF error messages that necessitated multiple attempts at filing many of Defendants' supporting declarations, Defendants did not complete their filing until approximately 12:35 a.m. this morning. Therefore, we respectfully request a *nunc pro tunc* 35-minute extension of Defendants' deadline to file these opposition papers.

We have conferred with Plaintiffs' counsel, who graciously consented to this request. We thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York
Attorney for Defendants

By: /s/ Rebecca S. Tinio
REBECCA S. TINIO
STEVEN J. KOCHVAR
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2774/2715
E-mail: rebecca.tinio@usdoj.gov
steven.kochvar@usdoj.gov